

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

JAMES CODY,
JASMINE BORDEN,
JOHN DOE,
JOHN ROE,
MICHAEL MOSLEY, and
DIEDRE WORTHAM,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

vs.

CITY OF ST. LOUIS,
for and on behalf of the
MEDIUM SECURITY INSTITUTION
a.k.a.
“THE WORKHOUSE,”

Defendant.

Case No. 4:17-cv-02707

DECLARATION OF VICTORIA ECHOLS

I, Victoria Echols, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am over the age of 18 and of sound mind.
2. I am the mother of Plaintiff “John Doe,” who has been detained by the City of St. Louis at both the Medium Security Institution and the St. Louis City Justice Center.
3. In early December 2020, my son called to inform me that he tested positive for COVID-19 while detained at the Justice Center. My son’s attorney later called me to confirm that my son had tested positive for COVID-19.

4. I called the Justice Center to check on my son's well being. I was told by a sergeant who answered the phone that my son was negative for COVID-19.
5. My son told me that he tested positive for the virus after being placed in a pod with approximately 14 other men, many of whom were either exhibiting symptoms of COVID-19 or had tested positive.
6. My son also told me that detainees at the Justice Center were rarely given replacement face masks, generally only after detainees made repeated requests. Detainees were also unable to socially distance. When he first arrived, detainees were not given sheets or blankets. Following complaints by detainees about the conditions, corrections officers at the Justice Center would also randomly spray mace down the halls and into the pods.
7. My son was relocated to the Medium Security Institution (MSI) soon after his call to me in December. Based on my son's positive COVID-19 test, and his observations, it seems he was moved because he tested positive for the virus.
8. At the MSI, my son was left in a pod with extremely cold temperatures while still experiencing symptoms of COVID-19. During any call he made, he complained about experiencing chest pains and continuously coughing.
9. Despite his symptoms, the cold temperatures at MSI were never fixed. He also had to wait to receive medical treatment, sometimes for days.
10. After arriving at MSI and suffering these conditions, my son complained to the correctional officers. After he complained about two weeks ago, one officer took a set of handcuffs, wrapped them around his knuckles, and physically attacked my son. Another correctional officer helped to tackle my son to the ground during this incident.

11. Separately, another correction officer wrongly believed my son was involved in some altercation between detainees and corrections officers over the weekend given his prior complaints about the conditions. She refused to allow him to have a haircut, recreation time, and even a shower. According to my son, he has spent days without a shower.
12. The water was also turned off over the weekend of February 6, 2021, meaning detainees could not wash their hands or follow any hygiene protocols, despite COVID-19 positive detainees, including my son.
13. On February 10, 2021, my son called me. He told me that his attorney had visited MSI to express concerns about the conditions, but that after his attorney left, the correctional officers refused to allow him recreation time because of his attorney's complaints. When the correctional officers heard he was talking to me about the conditions and their retaliation, they cut off the line during our call.
14. My son and I have called the mayor and other city officials, but we have just been ignored.
15. I am very afraid that something bad is going to happen to my son. During our calls, he expresses his fear, his frustrations given the conditions, and his anxiety given how detainees are testing positive for COVID-19, the lack of water, and the detainees' inability to follow basic hygiene like washing their hands, showering, brushing their teeth, and cleaning their living quarters.
16. I do not want to wake up one morning and be notified that my son has lost his life due to the conditions or been severely hurt.

I declare, under penalty of perjury, that the foregoing is true and accurate.

Victoria Echols

Victoria Echols

Dated: February 11, 2021